

VoIP Location/E911

I'm writing to comment on mandating location identification for VoIP telephony providers. While I feel that Primary line CLEC providers, like my company, should be required to provide ALI and E911 services. Our services are expected to work to the same level of service as the LEC's do. It's on secondary line providers, like Vonage tm where my views and many others differ.

It seems reasonable to require these providers to OFFER ALI and E911 service; however requiring it's activation on all lines seems excessive. In addition, generating a government mandated list of location data is excessive, and has serious privacy implications.

When I signed up for Vonage service over a year ago, I was made fully aware of how their service connected to emergency services, through information I was required to read on their web site. In fact, I was clearly advised to keep a primary line, or other method of dialing 911, as many factors could prevent their service from operating.

The question here, I think, is more of education, rather than enforcement. The government does not need to have my location information, unless I choose to give it. That is exactly how Vonage operates. I chose the low cost of their service, in lieu of the guarantees of service, which necessarily inflate the cost of primary line service. Consumers must simply be made aware of the differences between Primary and Secondary line service, which I don't believe has been adequately addressed.

I know how E911 and ALI works, and it is expensive. As a compromise, perhaps requiring VoIP phone providers, which allow interconnection with the PSTN, to OFFER E911 service, should their customers desire it. Require that if they offer E911 service, that it be substantially equivalent to primary line E911.

This, I know, is possible, and seems to me to be more reasonable a requirement. This would take into account those who do carry a Primary Line service provider, and use VoIP purely for its low cost. I, personally, do not wish to pay more for a service I haven't EVER used, not even through my primary service provider, and would decline such a service. This would allow VoIP carriers to more accurately invest in the infrastructure necessary to support this service.

Cost aside, I want to have the control over my personal information. I have a contract with my service provider, which includes a privacy policy. I do not have one with the Federal government, or any other entity, in relation to this service. Currently, I am allowed to choose whether or not my location is known, and emergency calls will not be completed if it is not. This was clearly explained to me, and I accept the consequences of my actions if I do not provide this information.

Quite frankly, I don't want you to know where my computer is, so I don't sign up in any internet directories. Likewise, I foresee the remote possibility that I may need to dial 911, and keep a cell phone in addition to my Vonage VoIP device for just such a purpose. If I didn't agree with those terms, I would sign up with a Primary line telephone provider. In fact, my only reason for keeping the Vonage service is to avoid peak airtime charges, and in case my battery runs out.

In summary, I believe that educating consumers in this area is vastly more important than forcing these voice/data service providers to become just another primary line service provider. There are plenty of choices, just make sure the people know what they're getting, and what their options are. Thank you.